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Attorneys for Defendants

VERIZON WIRELESS and VERIZON COMMUNICATIONS, INC.

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

TERESA MACCLELLAND; KAREN
UMBERGER; SCOTT WILLITS; MICHAEL
BRANOM; MOLLY BROWN; MICHAEL
CARNEY; TIM FRASCH; PATRICIA
GAGAN; ANNA GUTIERREZ; LINDA
JENKINS; AUGUSTUS JOHNSON;
WILLIAM KAUPELIS; MARILYN KAYE;
JANETTE LISNER; WILLIAM ERIC
LOUGH; DAVID MASSARO; LOUISE
MONSOUR; DARLEEN PEREZ;
GABRIELLE POZZUOLI; VALERIE REED;
BRUCE SCHRAMM; KERRY
SHOWALTER; JOHN ST. JARRE; GLORIA
STERN; EDNA TOY; TERESA TOY; and
VANESSA WEST; For Themselves, As Private
Attorneys General, and On Behalf Of All Others
Similarly Situated,

Plaintiffs,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS; and VERIZON
COMMUNICATIONS INC.,

Defendant.

CASE NO. 3:21-cv-08592-EMC

**JOINT STIPULATION TO AMEND
COMPLAINT AND EXTEND TIME
TO RESPOND TO COMPLAINT**

The Hon. Edward M. Chen

Trial Date: None Set

1 Pursuant to Local Rule 6-1 and 7-12, plaintiffs, and defendants Verizon Wireless and
2 Verizon Communications, Inc. (collectively, “Verizon”), through their respective attorneys,
3 stipulate and declare as follows:

4 WHEREAS, plaintiffs filed their Amended Complaint on December 31, 2021 (ECF No. 10);

5 WHEREAS, the Court’s July 1, 2022 order denied Verizon’s motion to compel arbitration
6 and stay proceedings;

7 WHEREAS, the deadline for defendants to respond to the Amended Complaint is July 15,
8 2022;

9 WHEREAS, plaintiffs intend to further amend their complaint to include a request for
10 punitive damages, which was not included in the First Amended Complaint;

11 WHEREAS, defendant will need to review plaintiffs’ further amended complaint, and to
12 investigate plaintiffs’ factual allegations with respect to dozens of named plaintiffs, and so require
13 additional time to prepare their response;

14 WHEREAS, the parties previously sought two extensions: by joint stipulation the Parties
15 agreed to a briefing schedule for any motion Verizon filed in response to the FAC (ECF No. 16);
16 by further stipulation, the Parties agreed to schedule the Case Management Conference on May
17 12, 2022, to coincide with the hearing on Verizon’s motion to compel arbitration, which hearing
18 the Court then *sua sponte* continued to May 19, 2022 (ECF No. 33);

19 WHEREAS, the proposed extension “will not alter the date of any event or any deadline
20 already fixed by Court order” under Local Rule 6-1(a).

21 NOW THEREFORE, plaintiffs and defendant hereby agree and stipulate as follows:

- 22 1. The deadline for plaintiffs to further amend their complaint will be July 20, 2022.
- 23 2. The deadline for defendant to respond to the Second Amended Complaint will be
24 September 19, 2022.
- 25 3. The deadline for plaintiffs to oppose any motion by defendant in response to the
26 Amended Complaint will be November 18, 2022.
- 27 4. The deadline for defendants to reply to any opposition by plaintiffs will be
28 December 19, 2022.

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3 DATED: July 14, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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5
6 By /s/ Crystal Nix-Hines
Crystal Nix-Hines
7 Attorneys for Defendant

8 DATED: July 14, 2022

HATTIS & LUKACS

9
10 By /s/ Daniel Hattis
11 Daniel Hattis
12 Attorneys for Plaintiffs
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16 **ECF ATTESTATION**

17 I, Crystal Nix-Hines, attest that all other signatories listed, and on whose behalf the filing
18 is submitted, concur in the filing's content and have authorized the e-filing of the foregoing
19 document in compliance with Local Rule 5-1(h)(3).
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21 /s/ Crystal Nix-Hines
Crystal Nix-Hines
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